

**1** DAWYN R. HARRISON, County Counsel  
**2** STARR COLEMAN, Assistant County Counsel  
**3** THOMAS R. PARKER, Senior Deputy County Counsel  
**4** (SBN 141835) • [TParker@counsel.lacounty.gov](mailto:TParker@counsel.lacounty.gov)  
**5** 648 Kenneth Hahn Hall of Administration  
500 West Temple Street  
Los Angeles, California 90012-2713  
Telephone: (213) 974-1834  
Facsimile: (213) 613-4751

**6** Thomas C. Hurrell, State Bar No. 119876  
E-Mail: [thurrell@hurrellcantrall.com](mailto:thurrell@hurrellcantrall.com)

7 Jonathan Fang, State Bar No. 279106  
E-Mail: [jfang@hurrellcantrall.com](mailto:jfang@hurrellcantrall.com)  
8 HURRELL CANTRALL LLP  
725 S. Figueroa Street, Suite 3800  
9 Los Angeles, California 90017  
Telephone: (213) 426-2000  
10 Facsimile: (213) 426-2020

**11** Attorneys for Defendants, CLARK R. TAYLOR, AICP, THE LOS ANGELES  
COUNTY DEPARTMENT OF REGIONAL PLANNING

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

16 CLINTON BROWN,  
17 Plaintiff,  
18 v.  
19 CLARK R. TAYLOR, AICP, THE  
20 LOS ANGELES COUNTY  
DEPARTMENT OF REGIONAL  
PLANNING,  
21 Defendants.

Case No. 2:22-cv-09203-MEMF-KS

**DECLARATION OF JONATHAN FANG, ESO.**

Assigned to:  
Hon. Maame Ewusi-Mensah Frimpong  
Courtroom "8B"

Magistrate Judge Karen L. Stevenson  
Courtroom "580"

1 I, Jonathan Fang, declare as follows:

2 1. I am an attorney duly licensed to practice before this Court and am an associate  
3 with Hurrell Cantrall LLP, attorneys of record for Defendant Clark R. Taylor. AICP. The Los  
4 Angeles County Department of Regional Planning herein. The facts set forth herein are of my  
5 own personal knowledge and if sworn I could and would testify competently thereto.

6 2. Clinton Brown never contacted Defendant's counsel to inform us of his intention to  
7 file his Motion to Accept, Reject, or Modify Magistrate's Order (IN PART) or to discuss the  
8 substance of his motion and any potential resolution.

9 3. Mr. Brown's serial motion and filings continue to be vexatious and frivolous and  
10 create an unnecessary burden on the time and resource of Defendant.

11 I declare under penalty of perjury under the laws of the State of California that the  
12 foregoing is true and correct.

13 Executed on May 25, 2023, at Los Angeles, California.

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15 *Jonathan Fang*  
16 Jonathan Fang  
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